

Michael V. Infuso, Esq., Nevada Bar No. 7388
Keith W. Barlow, Esq., Nevada Bar No. 12689
Sean B. Kirby, Esq., Nevada Bar No. 14224
GREENE INFUSO, LLP
3030 South Jones Boulevard, Suite 101
Las Vegas, Nevada 89146
Telephone: (702) 570-6000
Facsimile: (702) 463-8401
E-mail: minfuso@greeneinfusolaw.com
kbarlow@greeneinfusolaw.com
skirby@greeneinfusolaw.com
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

INTERIOR ELECTRIC INCORPORATED
NEVADA, a domestic corporation,

Plaintiff,

v.

T.W.C. CONSTRUCTION, INC., a Nevada corporation; TRAVELERS CASUALTY AND SURETY COMPANY OF AMERICA, a Connecticut corporation; MATTHEW RYBA, an individual; GUSTAVO BAQUERIZO, an individual; CLIFFORD ANDERSON, an individual; POWER UP ELECTRIC COMPANY, a Nevada limited liability company; PROLOGIS, L.P., a Delaware limited partnership; AML PROPERTIES, INC., a Nevada corporation; AML DEVELOPMENT 3, LLC, a Nevada limited liability corporation; LAPOUR PARTNERS, INC., a Nevada Corporation; DON FISHER, an individual; PHILCOR T.V. & ELECTRONIC LEASING, INC., a Nevada corporation, dba NEDCO; QED, INC., a Nevada corporation; TURTLE & HUGHES, Inc., a New Jersey corporation; DOES I-X, inclusive; and ROE CORPORATIONS I-X, inclusive,

Defendants.

Case No. 2:18-CV-01118

STIPULATION AND ORDER FOR
EXTENSION OF TIME FOR TWC
CONSTRUCTION, INC., MATTHEW
RYBA, AND MARK WILMER TO FILE
THEIR
REPLY IN SUPPORT OF THEIR
MOTION TO DISMISS PLAINTIFF'S
SECOND AMENDED COMPLAINT

(First Request)

1 Defendants T.W.C. Construction, Inc. (“TWC”), Matthew Ryba (“Ryba”), and Mark
2 Wilmer (“Wilmer”) (collectively referred to as “Defendants”), by and through their counsel of
3 record, the law firm Greene Infuso, LLP, and Plaintiff Interior Electric Incorporated Nevada
4 (“Interior Electric Nevada” or “Plaintiff”), by and through its counsel of record, the law firms of
5 Marquis Aurbach Coffing and the Law Offices of Philip A. Kantor, P.C., hereby stipulate and agree
6 as follows:

7 WHEREAS, Defendants filed their Motion to Dismiss Plaintiff’s Second Amended
8 Complaint (“Motion to Dismiss”) [ECF No. 191] on March 16, 2020;

9 WHEREAS, Plaintiff filed its Response to Defendants’ Motion to Dismiss [ECF No. 206]
10 on April 6, 2020;

11 WHEREAS, the deadline for Defendants to file their reply in support of their Motion to
12 Dismiss is currently April 13, 2020;

13 WHEREAS, Plaintiff has agreed to give Defendants up through and including April 27,
14 2020, in which to file their reply in support of their Motion to Dismiss;

15 WHEREAS, there are no other deadlines that are affected by this stipulation and proposed
16 order that are presently known to the parties; and

17 WHEREAS, Defendants’ counsel represents that the current deadline cannot reasonably be
18 met because of the disruption caused by the COVID-19 pandemic and not for any improper purpose
19 or to delay.

20 \\\

21 \\\

22 \\\

23 \\\

24 \\\

25 \\\

26 \\\

27 \\\

28 \\\

1 THEREFORE, Plaintiff and Defendants hereby stipulate and agree that Defendants have up
2 through and including April 27, 2020 in which to file their reply in support of their Motion to
3 Dismiss Plaintiff's Second Amended Complaint

4 DATED this 13th day of April, 2020.

DATED this 13th day of April, 2020.

5 **GREENE INFUSO, LLP**

MARQUIS AURBACH COFFING

6 /s/ Michael V. Infuso
Michael V. Infuso, Esq.,
7 Nevada Bar No. 7388
Keith W. Barlow, Esq.,
8 Nevada Bar No. 12689
Sean B. Kirby, Esq.,
9 Nevada Bar No. 14224
3030 South Jones Boulevard, Suite 101
10 Las Vegas, Nevada 89146

/s/ Chad F. Clement
Cody S. Mounteer, Esq.,
Nevada Bar No. 11220
Chad F. Clement, Esq.
Nevada Bar No. 12192
Kathleen A. Wilde, Esq.
Nevada Bar No. 12522
10001 Park Run Drive
Las Vegas, Nevada 89145

11 *Attorneys for T.W.C. Construction, Inc.,*
12 *Travelers Casualty and Surety Company of*
America, Matthew Ryba, and Mark Wilmer

LAW OFFICES OF PHILIP A. KANTOR, P.C.
Philip A. Kantor, Esq.
Nevada Bar No. 6701
1781 Village Center Circle, Suite 120
Las Vegas, Nevada 89134

Attorneys for Interior Electric

18 **IT IS SO ORDERED:**

19
20 
UNITED STATES DISTRICT JUDGE

21 4/13/2020
22 DATED: _____